

FILED
CLERK, U.S. DISTRICT COURT
02/25/2025
CENTRAL DISTRICT OF CALIFORNIA
BY: _____ LK _____ DEPUTY

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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

14 || UNITED STATES OF AMERICA,

CR 2:25-CR-00129-CV

15 Plaintiff,

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; DECLARATION OF
ELIA HERRERA

EDUARDO DOMINGO RENOJ-MATUL,
aka "Turko,"
aka "Turco,"
aka "El Jefe,"
aka "Patron,"
aka "El Gallo,"
CRISTOBAL MEJIA-CHAJ,
HELMER OBISPO-HERNANDEZ,
aka "Xabi,"
aka "Xavi," and
JOSE PAXTOR-OXLAJ,
aka "Vale Viente."

(UNDER SEAL)

Defendants.

25 The government hereby applies ex parte for an order that the
26 indictment and any related documents in the above-titled case (except
27 the arrest warrants for the charged defendants) be kept under seal

1 until the government files a "Report Commencing Criminal Action" in
2 this matter.

3 This ex parte application is made pursuant to Federal Rule of
4 Criminal Procedure 6(e) (4) and is based on the attached declaration
5 of Elia Herrera.

6 Dated: February 25, 2025 Respectfully submitted,

7 JOSEPH T. MCNALLY
8 Acting United States Attorney

9 LINDSEY GREER DOTSON
10 Assistant United States Attorney
11 Chief, Criminal Division

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13 ELIA HERRERA
14 SHAWN J. NELSON
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Attorneys for Plaintiff
UNITED STATES OF AMERICA

DECLARATION OF ELIA HERRERA

I, Elia Herrera, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Eduardo Domingo Renoj-Matul, et al., the indictment in which is being presented to a federal grand jury in the Central District of California on February 25, 2025.

2. The defendants charged in the above-captioned indictment have not been taken into custody on the charges contained in the indictment and have not been informed that they are being named as defendants in the indictment to be presented to the grand jury on February 25, 2025. The likelihood of apprehending one or more of the charged defendants might be jeopardized if the indictment in this case were made publicly available before some of the defendants are taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and related documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment and the government files a "Report Commencing Criminal Action" in this matter.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on February 23, 2025.

Elias Herrera

ELIA HERRERA